

August 27, 2002

Mr. Ryan Slavens
Federal Mogul Corporation
101 Industrial Blvd.
Logansport, IN 46947

Re: 017-16469
Third Administrative Amendment to
FESOP 017-10438-00029

Dear Mr. Slavens:

Federal Mogul Corporation was issued a FESOP on February 23, 2000, for a stationary fuel pumps and auto light lenses manufacturing operation for the automotive industry. A letter requesting an Administrative Amendment was received on August 16, 2002. The changes relate to a change in the Responsible Official information, and the deletion of some emission units and related conditions from the permit. According to 326 IAC 2-8-10(a)(6), an Administrative Amendment can be used for a modification that "revises descriptive information where the revision will not trigger a new applicable requirement or violate a permit term". Also, 326 IAC 2-8-10(a)(5) states that an Administrative Amendment can be used to make "a change to a monitoring, maintenance, or record keeping requirement that is not environmentally significant". The requested modifications meet the above requirements, therefore, pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as follows (~~strikeout~~ to show deletions and **bold** to show additions):

(1) The Responsible Official listed in Section A.1 is amended. A Plant Manager meets the definition of a "Responsible Official" under 326 IAC 2-7-1(34)(A)(v).

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary fuel pumps and auto light lenses manufacturing operation for the automotive industry.

Authorized individual: **Ryan Slavens Plant Manager**
Source Address: 101 Industrial Blvd., Logansport, Indiana 46947
Mailing Address: 101 Industrial Blvd., Logansport, Indiana 46947
Phone Number: (219) 722-6141
SIC Code: 3647, 3714, 8713

(2) The facility description in Section A.2 is amended and the remaining items re-numbered as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

~~(a) UV Coating Line, identified as EU-01, installed in 1991, consists of the following equipment:~~

~~(1) One (1) UV Spray Booth, identified as UVCOAT, utilizing a high volume low-pressure (HVLP) spray gun system, with a maximum coating rate of 200 plastic lens per hour, exhausting through one (1) stack S/V ID #S-1;~~

- (b a) Impregnation Line, identified as EU-02, installed in 1996, consists of the following equipment:

....

(3) The description of insignificant activities in Section A.3 is amended as follows:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

~~(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;~~

~~(1) Six (6) natural gas fired melting furnaces, identified as FURN 1 through FURN 6, respectively, located in the Aluminum Die Casting Process (EU-03), each with a maximum heat input capacity of 1.2, 0.45, 0.45, 0.45 1.2, and 0.75 MMBtu per hour, respectively;~~

(b a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;

(1) Two (2) cold cleaners with self closing lid, identified as DEGRDIE and DEGRTOOL; and

(2) Two (2) cold cleaners with drum reservoir, identified as DEGRPLAT and DEGRMOLD.

(4) The facility description in Section D.1 is amended as follows:

Facility Description [326 IAC 2-8-4(10)]

~~(a) UV Coating Line, identified as EU-01, installed in 1991, consists of the following equipment:~~

~~(1) One (1) UV Spray Booth, identified as UVCOAT, utilizing a high volume low-pressure (HVLP) spray gun system, with a maximum coating rate of 200 plastic lens per hour, exhausting through one (1) stack S/V ID #S-1;~~

(b a) Impregnation Line, identified as EU-02, installed in 1996, consists of the following equipment:

(1) Four (4) dip tanks, identified as TANK 1-4, each with a maximum coating rate of 288 pieces of metal fuel pump parts per hour. TANK 1 exhausts through one (1) stack S/V ID #S-2. TANK 2 and 4 exhausts to GV.

(5) Condition D.1.2 for the UV coating line is deleted.

~~D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]~~

~~Pursuant to CP-017-1958-00029, issued on April 5, 1991, the PM from the UV Spray Booth shall not exceed the pound per hour emission rate established as E in the following formula:—~~

~~Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

$$E = 4.10 P^{0.67} \text{ where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

(6) The remaining subsections in D.1 are re-numbered.

(7) Condition D.1.3 is amended as follows:

D.1.3 2 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC or PM limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

(7) The facility description in Section D.2 is amended as follows:

Facility Description [326 IAC 2-8-4(10)]

~~(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;~~

~~(1) Six (6) natural gas fired melting furnaces, identified as FURN 1 through FURN 6, respectively, located in the Aluminum Die Casting Process (EU-03), each with a maximum heat input capacity of 1.2, 0.45, 0.45, 0.45 1.2, and 0.75 MMBtu per hour, respectively;~~

~~(b a)~~ Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;

(1) Two (2) cold cleaners with self closing lid, identified as DEGRDIE and DEGRTOOL;
and

(2) Two (2) cold cleaners with drum reservoir, identified as DEGRPLAT and DEGRMOLD.

(8) References to the Office of Air Management (OAM) are changed to Office of Air Quality (OAQ).

(9) Section D.1 items are re-numbered in the Table of Contents.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

mm

cc: File - Cass County
U.S. EPA, Region V
Cass County Health Department
Air Compliance Section Inspector - Dave Rice
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Federal Mogul Corporation, Inc.
101 Industrial Boulevard
Logansport, Indiana 46947**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F017-10438-00029	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 23, 2000

First Administrative Amendment No. 017-12586
Second Administrative Amendment No. 017-12888
First Reopening No. 017-13016

Issuance Date: September 21, 2000
Issuance Date: December 15, 2000
Issuance Date: September 24, 2001

Third Administrative Amendment No.: 017-16469	Pages Modified: 3, 5, 6, 25, 26, 27
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 27, 2002

C.11 Pressure Gauge Specifications

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
- C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

- C.16 Monitoring Data Availability
- C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

Stratospheric Ozone Protection

- C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS

UV Coating Line (EU-01) and Impregnation Line (EU-02)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Compliance Determination Requirements

- D.1.2 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]
- D.1.3 Volatile Organic Compounds (VOC)
- D.1.4 VOC Emissions

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.5 Record Keeping Requirements
- D.1.6 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS

Aluminum Die Casting Line (EU-03), Electric Pump Test Line (EU-04), Technical Center Research and Development (EU-05)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]
- D.2.2 FESOP Limit [326 IAC 2-8]
- D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.2.5 Particulate Matter (PM)
- D.2.6 Visible Emissions Notations
- D.2.7 Parametric Monitoring
- D.2.8 Baghouse Inspections

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary fuel pumps and auto light lenses manufacturing operation for the automotive industry.

Authorized individual: Plant Manager
Source Address: 101 Industrial Blvd., Logansport, Indiana 46947
Mailing Address: 101 Industrial Blvd., Logansport, Indiana 46947
Phone Number: (219) 722-6141
SIC Code: 3647, 3714, 8713
County Location: Cass
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Rules;
Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Impregnation Line, identified as EU-02, installed in 1996, consists of the following equipment:
 - (1) Four (4) dip tanks, identified as TANK 1-4, each with a maximum coating rate of 288 pieces of metal fuel pump parts per hour. TANK 1 exhausts through one (1) stack S/V ID #S-2. TANK 2 and 4 exhausts to GV;
- (b) Electric Fuel Pump Test Line, identified as EU-04, installed in 1997, consists of the following equipment:
 - (1) One (1) Cummins electric fuel pump tester, identified as CUMEFP, with a maximum test rate of 88.75 pumps per hour, combusting diesel fuel, exhausting through one (1) stack S/V ID #S-22;
- (c) Technical Center Research and Development, identified as EU-05, installed in 1996, consists of the following equipment:
 - (1) Four (4) tanks, identified as T-1 through T-4, each containing spent fuel, unleaded gasoline, #2 diesel fuel, and GP-1140 fuel, respectively, each with a maximum tank capacity of 2000. 2000, 2000, and 1000 gallons, respectively;
 - (2) Three (3) fuel stands for testing pumps, with a maximum capacity of testing 4000

pumps per year, exhausting through stacks S/V ID ST-1, ST-2, and ST-3, respectively;

- (3) Flow testers for testing pump flows for sink, rotary vane #1 and rotary vane #2, with a maximum capacity of testing 119,600 pumps per year, exhausting through stacks S/V ID ST-1, ST-2, and ST-3, respectively; and
- (4) Stoddard solvent (drums) for testing fuel pumps with flow test sink, rotary vane #1, and rotary vane #2, exhausting through stacks S/V ID ST-1, ST-2, and ST-3, respectively.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
 - (1) Two (2) cold cleaners with self closing lid, identified as DEGRDIE and DEGRTOOL; and
 - (2) Two (2) cold cleaners with drum reservoir, identified as DEGRPLAT and DEGRMOLD.
- (b) Two (2) pump test stands, consisting of one (1) Roller Vane Diesel Tester designated as ROTVANTST and one (1) Oil Pump Audit Stand designated as OILAUDIT.
- (c) One (1) industrial parts washer.
- (d) One (1) roller vane oil pump test stand identified as "ROLVANOILTST".

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (a) Impregnation Line, identified as EU-02, installed in 1996, consists of the following equipment:
- (1) Four (4) dip tanks, identified as TANK 1-4, each with a maximum coating rate of 288 pieces of metal fuel pump parts per hour. TANK 1 exhausts through one (1) stack S/V ID #S-2. TANK 2 and 4 exhausts to GV.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to Registration 017-7769-00029, issued on April 21, 1997, actual input of VOC before controls from the four (4) dip tanks shall be kept below fifteen (15) pounds per day. Any change or modification, from the four (4) dip tanks that would increase in actual input of VOC to more than fifteen (15) pounds per day, shall obtain approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1 before such change can occur.

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Conditions D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.4 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the daily volatile organic compound usage for the most recent month.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
- (1) The amount VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each day;
 - (4) The total VOC usage for each day; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
 - (1) Two (2) cold cleaners with self closing lid, identified as DEGRDIE and DEGRTOOL; and
 - (2) Two (2) cold cleaners with drum reservoir, identified as DEGRPLAT and DEGRMOLD.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.2 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.